

# EXHIBIT 3

1 UNITED STATES DISTRICT COURT  
2 IN AND FOR THE DISTRICT OF WYOMING  
3

4 STEPHANIE WADSWORTH,  
Individually and as  
5 Parent and Legal Guardian CASE NO.:  
of W.W., K.W., G.W., and 2:23-cv-00118-NDF  
L.W., minor children, and  
6 MATTHEW WADSWORTH,  
7 Plaintiffs,  
8 vs.  
9 WALMART, INC. AND JETSON  
ELECTRIC BIKES, LLC,  
10  
Defendants.

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14  
15 VIDEOTAPED REMOTE DEPOSITION OF  
CALLIE M. THOMPSON, M.D., FACS  
Pages 1 to 56

16  
17 October 15, 2024  
12:34 p.m. ET to 1:51 p.m. ET  
18 10:34 a.m. MT to 11:51 a.m. MT  
Via Zoom Videoconference

19  
20  
21 Stenographically Reported By:  
HEATHER M. ANDREWS, Certified Court Reporter,  
Notary Public

22  
23  
24 Videotaped By:  
25 COREY MCMILLAN, Videographer

1 that.

2 Q. That's okay. We'll go through it in a minute.  
3 I'll ask you some questions as we go through this  
4 process, and certainly if there's ever a moment where  
5 you feel you need to go to the record, that's fine.  
6 Just let me know what you're looking at so we're looking  
7 at the same thing. Okay?

8 A. Yep.

9 Q. Certainly after she was discharged from her  
10 initial admission you continued to follow up with  
11 Stephanie and to provide her care and treatment  
12 primarily through the laser therapy you described is  
13 that right?

14 A. That's correct.

15 Q. And just so I understand and the jury, if they  
16 get to read your deposition transcript, understands at  
17 the university and specifically within the burn unit,  
18 would it be fair to say all of the health care providers  
19 operate as a team?

20 A. That's correct.

21 Q. And so by way of example as Stephanie is  
22 admitted under your service, certainly there would have  
23 been other surgeons as well that would have cared for  
24 her and treated her over the course of her admission?

25 A. Yes, that's correct. In 2022 when she was

1 admitted there were three burn surgeons here.

2 Q. Would that have included Dr. Lewis?

3 A. Dr. Lewis and Dr. Fleming.

4 Q. At some point in time did Dr. LaChapelle come  
5 on board for purposes of treating burn survivors?

6 A. Yes. He joined us in October of 2022.

7 Q. So even though you would have been the  
8 admitting and attending for Stephanie back in February  
9 and March of 2022, Dr. Lewis and Dr. Fleming would have  
10 also been involved in her care and treatment?

11 A. That's correct. We take calls Friday morning  
12 at 6:00 a.m. to the following Friday morning. So we  
13 switch off Friday mornings and we hand over the entire  
14 service so all of the care to the patients is completely  
15 handed off to the next person who is on call.

16 Q. We can flip to whatever note you would like to  
17 but let me just ask you generally, are you familiar with  
18 the extent of Stephanie's burn injuries, at least as of  
19 her admission from February of 2022?

20 A. Yes.

21 Q. Okay. Describe for the jury what your  
22 knowledge and recollection is of Stephanie's injuries  
23 were back in February of 2022?

24 A. So I'm going to look at the H&P from February  
25 1st, 2022 that was co-signed by my partner, Dr. Irma

1 patient reports less itching, more pliability, improved  
2 function. If they're working we do -- so we do four and  
3 then we reassess and we do an additional four. Those  
4 laser treatments should be four to eight weeks apart  
5 ideally, but they don't have to be that distance apart  
6 for efficacy. That's just ideal.

7 Q. If they are working is the maximum amount of  
8 treatments eight?

9 A. Typically, yes.

10 Q. What happens if laser treatment fails?

11 A. So if it isn't working for a patient then we  
12 utilize our alternative scar management, which is  
13 compression, silicone, scar massage and time. We didn't  
14 have laser before really like 2016. We weren't doing it  
15 regularly and it was just people waited for their scars  
16 to improve with time.

17 Q. As it pertains to Stephanie Wadsworth do you  
18 know how many laser treatments she has undergone to  
19 date?

20 A. I can look for you. I feel like she's almost  
21 towards her end but let me double check.

22 Q. Sure.

23 A. She completed her eight treatment on -- there's  
24 an H&P that's co-signed by Dr. Lewis on 8/5/2024 that  
25 was for her eighth treatment. So she should, based on

1 our typical practice, be having a visit with one of the  
2 burn surgeons here to discuss next steps for scar  
3 management after the eighth treatment.

4 Q. And that's a record that I don't have yet since  
5 it's only been, I guess, a couple of months since then.

6 But did Dr. Lewis discuss in any of her entries  
7 the expected plan or prognosis for Stephanie as it  
8 relates to caring for those scars?

9 A. The only statement I have, I can read it for  
10 you, is that "Patient has completed the recommended  
11 eight treatments per our burn center practice guideline.  
12 We in assessment will include a provider and therapy  
13 assessment using the VBSS measurement tool in four to  
14 six weeks.

15 Q. All right. Sitting here today do you know if  
16 that follow-up and reassessment has been scheduled?

17 A. It has not been scheduled. It appears that  
18 Stephanie was working on rescheduling and has not  
19 messaged back in our patient message portal.

20 Q. You have an understanding that Stephanie and  
21 her family live in Wyoming?

22 A. Yes. They live in Green River I believe.

23 Q. When Stephanie would come for these laser  
24 treatments, would it be -- if you know, would it be  
25 typical for her to stay overnight given the distance?

1 surgeons that get together every other month and we  
2 review cases. And we review what the patients are  
3 unhappy about, what they would like potentially to have  
4 intervened upon. Then we discuss as a group whether or  
5 not we actually have the ability to do that because  
6 there's things people want changed that medicine just  
7 can't provide that.

8 Q. And by way of example one of the areas which  
9 she has at least voiced to you having concerns about,  
10 and if I can use that term for a moment, would be her  
11 face or her forehead.

12 Is she a candidate for any type of scar  
13 revision surgeries relating to those issues?

14 A. Probably not because it's her forehead and not  
15 her haired part of her head so things like tissue  
16 expanders aren't really going to fix the problems she  
17 wants us to fix.

18 Q. Okay. How about relating to the scars that she  
19 has on her hands, are there scar revision surgeries that  
20 are available to her to address those issues?

21 A. Not if she has full functional capacity.

22 Q. Are there any areas of her body that based on  
23 at least your recollection and last visit with her, you  
24 believe she would be a candidate for scar revision  
25 surgery?

1 A. Not at this time but we haven't seen her post  
2 her eighth laser.

3 Q. Okay. Would the reassessment or that follow-up  
4 visit following her eighth laser on August 5th, I think  
5 you said it was, would that reassessment take into  
6 account any potential future care needs, procedures or  
7 treatments for Stephanie?

8 A. Yes, it would.

9 Q. Is there an individual within the burn unit who  
10 would be responsible for that reassessment or would it  
11 be any one of the three or four folks that you  
12 mentioned?

13 A. It would be any one of us except for  
14 Dr. Fleming who doesn't do reconstruction on hands.

15 Q. Okay. Sitting here today do you know who would  
16 be tasked with that responsibility for the reassessment  
17 for Stephanie?

18 A. No, because it hasn't been scheduled.

19 Q. One moment. Let me just see if I can pull  
20 something up here.

21 I'm just pulling up an H&P note from September  
22 6th, 2022, and it lists you as the attending here.

23 Have you, probably not in anticipation of the  
24 deposition, but I would assume at some point you would  
25 have been involved in creation of this note or at the



1 Q. And outside of counsel did you speak to anybody  
2 in preparation for today's deposition?

3 A. I did not.

4 Q. And you didn't review any of the records;  
5 correct?

6 A. Not before just looking in the chart, no.

7 Q. In your professional opinion what is  
8 Stephanie's future outlook with regards to her burn  
9 injuries?

10 MR. AYALA: Form.

11 A. I would expect that she will have a full return  
12 to her preinjury level of function and that she will  
13 have a very personal response to her lifelong scars that  
14 I cannot speak to.

15 Q. (By Mr. Giroux) And that personal response,  
16 the reason you can't speak to that I think you talked  
17 about earlier is because each survivor responds to burns  
18 and deals with them differently; correct?

19 A. Yeah. And I think you can see that just  
20 within, between Stephanie and Weston. Weston lives  
21 every day like he doesn't have a burn.

22 Q. And how would you characterize Stephanie as  
23 being different than Weston in that regard?

24 A. Stephanie has always expressed to me a lot more  
25 concern about the physical appearance of her scars.